



**National
Urban League**

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Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St, S.W.
Washington, DC 20554

Re: MB Docket No. 15-146 - Amendment of Parts 15, 73 and 74 of the Commission's Rules to Provide for the Preservation of One Vacant Channel in the UHF Television Band For Use By White Space Devices and Wireless Microphones

Dear Ms. Dortch:

On behalf of the National Urban League, I write to express concern about the Federal Communications Commission's (FCC) adopted proposal to reserve one or more television channels for unlicensed use. The Urban League has long been a proponent of actions that promote universal broadband adoption. We recognize the nexus between technology-enabled opportunity and our historic mission: to enable African Americans and other underrepresented urban residents the ability to secure economic self-reliance, parity, power and civil rights. Therefore, while we appreciate the significance of the ongoing incentive auction in addressing spectrum shortages, we urge the FCC to exercise caution due to how the auction results may intersect with the FCC's vacant channel proposal.

Minority broadcast ownership remains a vital issue. The need for diversity in programming and language access, especially in low-income communities, is more critical than ever. The FCC has frequently stated that increasing and promoting ownership by minorities and women is an important public policy goal. The FCC has also rightly prioritized low power television (LPTV) and translator stations over unlicensed operations. By the FCC's own admission, LPTV provides locally-oriented service in rural communities or "individual communities within larger urban areas."¹ The FCC has gone on to admit that:

LPTV service offers programming tailored to the interests of viewers in small localized areas in a less expensive and more flexible way than traditional full-service/power TV stations. It has created opportunities for new entry into television broadcasting, provided a means of local self-expression, and permitted fuller use of the broadcast spectrum.²

¹ Federal Communications Commission <https://www.fcc.gov/consumers/guides/low-power-television-lptv-service>.

² Id. (emphasis added).

Following the incentive auction, we anticipate significant erosion in minority and women owned stations, as many of these owners are often at the edge of the market and will realize a potentially significant economic benefit. We believe this may also displace LPTV stations. This is concerning as the displacement of LPTV stations and television translators, negatively impacts minorities, women and underserved communities.

Generally, ownership of full power commercial television is cost prohibitive absent significant capital partners and resources. However, LPTV is a viable less costly alternative and a more probable ownership entry point. This is likely why at 1.3 percent, LPTV ownership among African Americans is nearly two times that of full power commercial television.³ The Urban League is committed to increasing minority ownership in broadcasting, and believes LPTV provides an area of focus wherein we can increase ownership numbers. Thus, while we appreciate the necessity of the incentive auction, we urge the FCC to assess whether the vacant channel proposal in conjunction with the reverse auction will eliminate or significantly reduce low-power operations, in such a manner that it would then also eliminate opportunities for low-cost entry for minority and women-owned broadcasters.

The FCC must not disregard its longstanding goal of increasing broadcast ownership by minorities and underrepresented groups. We urge the FCC to ensure that any actions in addition to the incentive auction will not disenfranchise underserved viewers in low-income households who disproportionately rely on over-the-air programming.

Sincerely,



Marc H. Morial
President and Chief Executive Officer
National Urban League

cc:

The Honorable, Tom Wheeler, Chairman
The Honorable Mignon Clyburn, Commissioner
The Honorable Jessica Rosenworcel, Commissioner
The Honorable Ajit Pai, Commissioner
The Honorable Michael O’Rielly, Commissioner

³ Federal Communications Commission Report on Ownership of Commercial Broadcast Stations, June 27, 2014.